

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Thomas Karns, being duly sworn, state as follows:

1. Since November of 2002, I have been employed by the Harvard University Police Department as a Police Officer. Since May of 2006, I have been assigned to the Criminal Investigation Division, which is a unit specializing in follow-up investigations. Since June of 2022, I have been assigned to the Federal Bureau of Investigation's Joint Terrorism Task Force and have been sworn as a Deputy U. S. Marshal. I have received specialized training in computer forensic examinations, cell phone forensic examinations, interview and interrogation techniques, computer investigation training, dignitary protection training, and crime scene processing training. Prior to my employment with the Harvard University Police Department, I was employed as a police officer for the City of Boca Raton, Florida from September of 2000 to October of 2002. I have a Master of Liberal Arts in Extension Studies degree with a concentration in information management systems from Harvard University. During my 22 years as a police officer, I have participated in numerous investigations involving serious crimes, including homicides, rapes, assaults, armed robberies, and narcotics offenses. I have participated in the drafting and execution of more than 20 search warrants.

2. I am submitting this Affidavit in support of an application for a criminal complaint charging WILLIAM A. GIORDANI ("GIORDANI") (YOB 1968), with violations of: 18 U.S.C. §§ 875(b) and 2 (aiding and abetting interstate extortion); and 18 U.S.C. § 371 (conspiracy) in connection with a series of extortionate bomb threats to Harvard University on April 13, 2023.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel and witnesses. Where statements of others are set forth in this affidavit, they are set forth in sum and substance and not

verbatim. The events described in this affidavit occurred on or about the dates and times provided herein. This affidavit is intended to show merely that there is sufficient probable cause to conclude that GIORDANI committed the offenses set forth above.

The Craigslist Ad

4. On or about April 11, 2023, an individual identifying himself as “Nguyen Mihn” posted an advertisement on craigslist.org at the following uniform resource locator: <https://boston.craigslist.org/gbs/lbg/d/harvard-pay-for-small-side-job-will/7609387366.html>. The advertisement was titled: “I pay for a small side job. Will need items purchase and moved. (Cambridge)” The body of the ad read:

Hello I am single father of 3 and my eldest son gos to Harvard. He need some supplies delivered to him before Monday and I dont have time to bring to him. I need you to buy some item for him and deliver, I am very busy I cant and my son need to stay study. Will pay very well, i will also pay back for cost of items. We are Vietnamese family, sorry for poor english.

The Subject listed a contact number of 201-468-0677, and was willing to pay \$300 for the service.

The Extortionate Threat

5. On April 13, 2023, at approximately 14:27 in the afternoon, the Harvard University Police Department (HUPD) dispatcher received a call from 201-468-0677.¹ The caller stated, through what sounded like a computer-generated male voice which appeared designed to disguise the caller’s identity, as follows:

There are three bombs planted around the Harvard Campus and we are ready to provide undeniable proof. For the sake of the student do not hang up until we have had a chance to demonstrate that this situation is real. This call is a follow up to one you received a few hours ago and I want to reiterate that this is not a prank. We are

¹ On April 13, 2023, HUPD used open source information to determine that 201-468-0677 was registered with Bandwidth.com. An Emergency Disclosure Request was sent to Bandwidth.com and Bandwidth.com indicated that the phone number was leased to Google. On April 13, 2023, HUPD sent Google LLC an Emergency Disclosure Request for information about the telephone number. Google responded that the number was a Google Voice number assigned to a specific Google account which had been opened in early April 2023.

not foolish children, and we are not here to waste your time. We do not want to provoke a law enforcement response. In fact, it is better that you do not take any action until we have made our terms clear. If you choose to hang up the call, we will try and contact you again, and if our attempts at making contact seem pointless, we will just detonate all three bombs. The remainder of this message is rendered with significantly advanced voice technology but for the sake of hundreds of students you will listen closely to it.

There are bombs on campus and we are ready to provide proof. Do not hang up. This message will be no longer than minutes and will contain detailed explanation for how we believe this threat is real and will also contain our demands. This is not a joke, a prank, or a drill. There are real lives at stake today. Earlier today our team planted three remotely detonated improvised explosive devices in populated areas across the Harvard campus. While we do not want to detonate these devices, we will not hesitate to do so if you fail to meet our demands. We are prepared to disclose to you the location of one of these bombs as proof the situation is not fabricated. We are actively monitoring each of these devices and their immediate surroundings. Do not take any action against this threat until we have made our terms clear. Do not attempt to evacuate students. Do not attempt to notify students or faculty of the situation and do not prompt law enforcement to seek out these devices until we have authorized you to do so. Non-compliance with our orders will result in immediate detonation of all three devices and the death or injury of hundreds of students. We will know if you try to issue any messages to students or faculty via text or email.

These devices each have an explosive yield of at least 80 megajoules and contain several pounds of metal shrapnel. If these bombs were detonated now, we estimate that at least 40 students would die and hundreds be badly wounded. Our control server is issuing encrypted packets to these devices that at a regular interval of 30 seconds which prevent them from detonating and if a scheduled packet fails to reach one of the bombs within a second of its expected arrival that bomb will detonate immediately, which means that any attempts to block our communication with these devices will result in detonation in no more than 31 seconds.

If our demands are met we will issue a defusal message to all three devices which will disarm them and we will disclose the location of all three bombs at once. If you fail to meet our demands within 100 minutes of the initial call or violate any of the conditions we have laid out for you all contact between us will be terminated and the explosives will detonate immediately and without notice.

Each bomb is also being monitored by a live camera which we have access to. Any attempt made to obstruct, disable, or interfere with these cameras will result in the detonation of all three devices. We will also detonate these devices if we notice any attempts to evacuate students or to tamper with any of the devices that we haven't explicitly authorized. Be warned, any attempts to manually defuse these devices

will surely prove futile. Each bomb is secured in a locking safe which we are confident you will be unable to pick. Furthermore, any attempts to crack these safes will very likely lead to the detonation of the explosive material contained inside.

We will provide a phone number which you will text but never call, in order to negotiate our demands. You will get a negotiator to text us without hanging up or transferring this call. The number which you will use to contact us via text is 201-468-0677, I repeat 201-468-0677.

Make no mistake time is not on your side any attempts to stall or distract us will only subtract from the time you have left to defuse this situation. You have roughly 97 minutes to satisfy our demands less the events of today become a blood and stain on your nation's history and on the history of Harvard University. As mentioned we will disclose the location of one explosive device to you, so that you can confirm the authenticity of this threat. The location of this bomb will be revealed as soon as it is made clear via text that you wish to cooperate with our demands. Whenever you are ready to confirm the authenticity of this threat send a plain clothed officer with a bomb sniffing K9, who should also be garbed in distinguishing attire, to the location we will disclose through text and the officer should have no difficulty locating the device with the help of his K9. He must ignore any attempts by students to speak with him.

In the meantime, you should begin preparing a large bitcoin transaction as soon as possible so that any technical difficulties can be resolved in the next 96 minutes. We also request that you send the bitcoin using the fastest available transaction speed because if we cannot completely confirm payment when 100 minutes is up we will detonate the bombs regardless of whether there is a transaction in progress. We will defuse the devices and disclose their locations as soon as we can confirm the payment of an agreed upon bitcoin amount to the wallet we will disclose over text.

6. Between 14:36hrs and 16:06hrs on April 13, 2023, HUPD received another six calls regarding the bombs and demand for payment. Five of those six calls were made from 201-468-0677, and the voice was again the disguised mechanical voice. During the forth call to HUPD dispatch at 15:25hrs, the caller gave a location and a description of one of the devices. He said one of the devices was on the Science Center Plaza between two food trucks in a red and black Husky tool bag.² April 13 was the first 80 degree day of the spring, a day when students and other

² I know from my training and experience that communications with mobile telephone devices are in and effecting interstate commerce. I also know that Area Code 201 is a New Jersey area code. Moreover, I know from my

members of the Harvard community would reliably be eating, studying, and socializing in the plaza and other outdoor spaces on campus.

Giordani Places The Device On The Science Center Plaza

7. The Harvard Common Spaces program of Harvard University manages a camera that livestreams video of the Science Center plaza through a YouTube.com platform. In the days following this incident, I was provided a copy of the video that captures an individual placing a device on Harvard University Science Center Plaza just after 2 p.m. on April 13, 2023. As outlined below, there is probable cause to believe that that individual was GIORDANI.

8. The video starts at approximately 14:10:09 with a white male wearing a blue short sleeved shirt and shorts, carrying a red and black tool bag in his right hand entering at the top left-hand corner of screen. This individual walks on the plaza and exits at the bottom left-hand corner of the screen approximately 36 seconds later. The white male is off camera for approximately two minutes before reappearing carrying the red and black tool bag in his left hand.



training and experience, as well as from information from Google LLC that data associated with communications from a Google Voice account is routed through Google data centers. Since there are no Google data centers in the District of Massachusetts, there is also probable cause to believe that the threatening communications from the Google Voice number 201-468-0677 were transmitted over state lines.

9. The individual walks to the center of the plaza and sits down on a bench and places the red and black tool bag on the bench beside him.



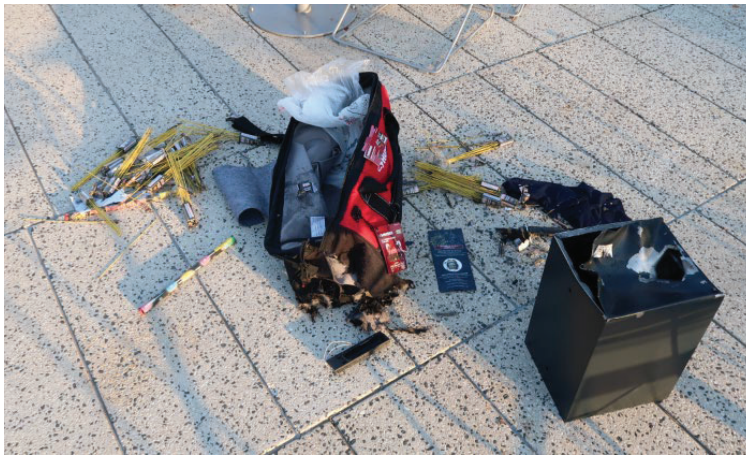
10. The individual then appears to be looking at something in his hands, consistent with someone looking or texting on a mobile phone, for several minutes. He stands up, leaves the bag in the plaza, and walks toward the left-edge of the video. He again appears to be looking at something in his hands before disappearing out of view of the camera. He reappears briefly standing at a distance from the bag, and then walks out of view of the camera again. The individual reappears and sits down next to the red and black tool bag on the bench again appearing to look at something in his hands. At approximately 14:19 the individual stands up and walks away from the red and black tool bag and appears to take a phone call. He walks in between the two food trucks parked on the plaza. He briefly reappears behind one of the food trucks before leaving the plaza.

Police Response

11. At 15:40hrs – shortly after the caller had identified the Science Center Plaza as the location of one of the bombs -- HUPD officers went to the plaza and discovered the Husky tool bag on a bench in the middle of the plaza where it had been placed by GIORDANI. HUPD cleared

the plaza, cordoned off the area around the bag, and also cleared the adjacent academic buildings of all persons. An alert to avoid the area was also sent to the University community.

12. The Cambridge Police Department's bomb disposal unit was alerted and responded to the plaza. It assessed the bag and executed a controlled destruction using a robotic device. An inventory of the device post-destruction revealed that the red and black Husky tool bag contained a metal locking safe (similar to what would be found in a hotel room), a package of wire and a quantity of fireworks inside the safe, and a small rectangular box with wires attached to it. The following is an image of destroyed device:



13. The package of wire found in the bag had a yellow Home Depot sticker affixed to it with the name "NGUYEN Minh," and a phone number: 201-468-0677. The sticker also included a bar code, an order number of WP63950968, the name Leo Desousa, Home Depot Store Manager and the phone number (617) 442-6110 printed on it. Open source reporting revealed that (617) 442-6110 and Mr. Desousa are associated with the South Bay Center Home Depot located at 5 Allstate Road, Boston MA 02125.

Tracing the Home Depot Purchases to Giordani

14. On Friday, April 14, 2023, in response to an inquiry about the wire found in the device found on the Science Center Plaza, Home Depot Loss Prevention Manager Chris

Didomenico, provided store surveillance video and receipts of two purchases made on April 13, 2023, related to order WP63950968. According to Mr. Didomenico, online order WP63950968 was placed at approximately 6:52 a.m. on April 13, 2023, in the name of Minh Nguyen and had a contact number listed as 201-468-0677. The pick up time was estimated to be at 8:49 am on 4/13/2023 and the pick up person was listed as “Minh Nguyen,” or “bill from craigslist.” The order was for 250 ft. 18lbs 24 guage galvanized wire, a 0.58 Cu. Ft. Safe box with digital lock, and a 24 inch 16 pocket zippered tool bag. The total amount of \$170.96 was paid online via Home Depot gift card number 156014850302. After the order was placed, the order for the zippered tool bag was cancelled, as it was not in stock.

15. The pickup was made at approximately 11:45 a.m. by an individual later confirmed to be GIORDANI. Home Depot issued a gift card for the tool bag which had been cancelled; the gift card was issued to GIORDANI. GIORDANI was captured on security video leaving the store with the wire and the safe box:



16. GIORDANI was again captured on security video returning at approximately 12:20hrs and purchasing a Husky 22 inch spring-loaded tool bag:



17. In purchasing the bag, GIORDANI used the recently supplied Home Depot gift card to make the purchase but, because the bag was more expensive than the gift card value, he also used ten dollars in cash and a debit card in the name of a person referred to herein as "AC." Open source reporting shows that AC and William GIORDANI have resided together in the recent past.

18. I have compared the images from the Home Depot security cameras at the times of these transactions with a registry of motor vehicles photograph of GIORDANI and confirmed that they are the same individual. In addition, the clothing worn by the individual seen depositing the

red and black bag in Science Center Plaza on April 13, 2023, appears to match the clothing worn by GIORDANI at the South Bay Home Depot when he picked up the red and black Husky tool bag, the wire, and the metal safe, earlier in the day.

Officer Contact with Giordani

28. On April 25, 2023, other officers working on this matter contacted GIORDANI via telephone and asked to meet with him. GIORDANI, while reluctant, agreed to meet with officers at a specific location in Tyngsboro, Massachusetts at 10 a.m. on April 27, 2023.

29. On April 27, 2023, GIORDANI failed to appear at the agreed-upon location. Officers spoke with him on the telephone again and GIORDANI claimed that he was not comfortable meeting because he could not verify the fact that the officers were in fact who they said they were. GIORDANI suggested that officers speak with his mother (referred to herein as “DR”), which they did. In the call with DR on April 28, 2023, she agreed that she and her son would meet officers at the FBI’s resident office in Bedford, New Hampshire at 10 am on May 1, 2023.

30. At 10 a.m. on May 1, 2023, DR appeared at the FBI’s resident office in Bedford, New Hampshire and explained that her son refused to accompany her to the meeting. She stated that GIORDANI was afraid that he would be arrested for transporting fireworks across state lines. Officers asked DR if she would call her son and encourage him to come to the FBI office. She did so in officers’ presence, and placed the call on speakerphone.

31. GIORDANI answered the call from DR. When DR said that the FBI wanted to speak with him and to look at his mobile phone, he said that he knew that but that he didn't want to get arrested for transporting fireworks across state lines. GIORDANI also that “all he did” was respond to a craigslist ad and place the fireworks -- bottle rockets and roman candles -- and a cable

in a safe, put it in a bag, and place the bag at a square at Harvard. GIORDANI also told DR (while officers listened) that he spoke to the person who placed the craigslist ad and that person told GIORDANI that he would be calling Harvard Police to make a bomb threat to get money. GIORDANI also stated that at the caller's direction he then traveled to Worcester to get paid. When GIORDANI arrived in Worcester, the person told GIORDANI that he wasn't able to meet with him, and added that he wasn't Asian (as claimed in the craigslist ad), didn't have kids (as claimed in the ad), and started "spouting off a bunch of racist things about blacks and Jews." GIORDANI reiterated that he was not willing to give up his phone but that he would meet with DR and send screenshots of all of the information that the FBI. GIORDANI asked DR to come pick him up at a specific location in Nashua, New Hampshire.

32. Officers traveled to Nashua with DR. When DR met GIORDANI, officers approached them and introduced themselves to GIORDANI. GIORDANI was extremely displeased by DR's decision to bring officers with her to the meeting and berated her. Officers sought to calm GIORDANI, and then requested to speak with GIORDANI about the craigslist ad and the events at Harvard. They also asked to review the communications on his phone with the craigslist advertiser. GIORDANI refused to give access to his phone or to discuss the incident in detail, claiming that the phone was "his business phone" and that there were also intimate photographs on the device. While declining to show officers his mobile phone, GIORDANI admitted that he knew what he did was wrong and that he "just put some fireworks in a safe and put them at Harvard."

CONCLUSION

33. On the basis of the foregoing information, there is probable cause to conclude that WILLIAM A. GIORDANI did aid and abet another individual who, with intent to extort from

Harvard University a thing of value, transmitted in interstate or foreign commerce a communication containing a threat to injure the person of another, in violation of 18 U.S.C. §§ 875(b) and 2; and did conspire with one or more persons to commit a violation of 18 U.S.C. § 875(b), and took an act to affect the object of the conspiracy, in violation of 18 U.S.C. § 371.

Thomas Karns /by Paul G. Levenson

THOMAS KARNs

Task Force Officer

Federal Bureau of Investigation

Sworn to and subscribed to me telephonically
this 2nd day of May 2023


Hon. Paul G. Levenson

United States Magistrate Judge

